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October 28, 2020

Hon. John G. Koeltl  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Filed on ECF

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

10/28/20

Re: United States v. Luilly Fernandez  
20 Cr. 109 (JGK)

Dear Judge Koeltl:

We represent the defendant Luilly Fernandez under the Criminal Justice Act (“CJA”). We write this letter to respectfully seek the Court’s permission to file an interim voucher at this time.

As Your Honor may recall, the seven-count indictment in this case charges Mr. Fernandez and his brother, co-defendant Marvin Gamoneda, with a nine-years long racketeering conspiracy, the underlying acts of which are conspiring to sell marijuana and narcotics, and for engaging in “acts of violence” in furtherance of the conspiracy. Since we were appointed in this matter in February 2020, we have put in a great deal of time reviewing the discovery (which is sizeable), drafting and arguing two separate bail motions (for which we needed to research and investigate issues related to our client’s health and the COVID-19 conditions within the prison system and the MCC in particular), meeting by phone and video conference with our client on a regular basis, and researching and drafting pretrial motions (which were originally due to be filed last week but have now been postponed since Mr. Gamoneda changed counsel), among other things. The trial date in this case has been set for the end of March 2021.

In April 2020, Chief Judge McMahon had issued an order in light of the COVID-19 pandemic allowing CJA attorneys in this District to submit interim vouchers without seeking individual orders. Since such order expired on September 30, 2020, we now seek permission from the Court for us to file an interim voucher at this time.

Respectfully submitted,

*Sarah M. Sacks*